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4/9/1985

Narrative Inspection Report

Facility: Chemical Processors, Inc. (Chem Pro)
ID No. WAD00812917
Address: Pier 91, Seattle Washington

Date of Inspection: April 9, 1985

Inspectors: W. Pierre, EPA – Seattle
A. Boyd, EPA – Seattle
L. Ashley, DOE – Northwest

Report prepared by: Andrew Boyd 5/31/88
RCRA Compliance Section
EPA – Seattle

References: Green Bound Inspection Notebook
Inspection photographs

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Purposes of the Inspection:

(1) to assess compliance with applicable hazardous waste laws and regulations,
(2) oversight of state inspection procedures,
(3) to provide field experience and training,
(4) to exchange information on field activities with state personnel.

Introduction

The State of Washington Department of Ecology (DOE) hazardous waste program has been authorized by EPA, and operates in lieu of the federal program. However, EPA retains responsibility for administering requirements imposed by the 1984 amendments to RCRA. The state DOE has assumed primary responsibility for conducting RCRA inspections, and documenting the compliance status of facilities subject to RCRA. EPA conducts periodic oversight inspections in authorized states to help assess the adequacy of the state hazardous waste program. Chem Pro was selected as a site for an EPA oversight inspection.

General Facility and Process Information

The Chem Pro facility opened on 7/1/70 and operates primarily as a waste oil reclamation facility. Re-usable oil is reclaimed by seperating impurities in tanks. Oil/water seperation, phenol oxidation, precipitation of heavy metals, pH adjustment, and chromium reduction in the tanks are the methods described in the facility's Part A permit application. Waste is received from a number of sources, including petroleum refining, bilge water from barges and tankers, paint booth wastes, and contaminated water.

Notification and Permitting

Chem Pro submitted a Notification of Hazardous Waste Activity (form 8700-12) adted 8/13/80, received by EPA on 8/18/80. The notification indicated that the facility was a generator, transporter, and treatment, storage & disposal facility.

Chem Pro submitted a Part A application dated 11/14/80, received by EPA on 11/18/80. The Part A was revised on 7/23/82. The revised Part A indicates that the facility treats and stores hazardous waste in tanks. The facility reported a tank storage capacity of 9,036,090 gallons, and a tank treatment capacity of 40,000 gallons per day. A copy of the site diagram is attached as Appendix .

Facility Inspection - General

Arrangement were made with L. Ashley of DOE to conduct a joint/oversight inspection of the facility. L. Ashley contacted the faciltiy and scheduled the inspection. It was agreed amongst the inspection team that the state would lead the inspection, but that EPA inspectors would be actively involved and that the inspection would be conducted jointly.

Opening Conference

The inspection team arrived at the Chem Pro offices at about 9:05 a.m. We were met by Dennis Stefani, Chem Pro Manager of Regulatory Affairs. We identified ourselves and (Boyd and Pierre) showed D. Stefani EPA identification cards. We were ushered to a back room where the opening conference was conducted. In attendance were the inspection team (Boyd, Pierre, and Ashley), D. Stefani, David Gato of Boeing, and Ron West, President of Chem Pro. An attendance list was circulated (copy attached).

The purpose and scope of the inspection was described. L. Ashley provided Chem Pro with a blank copy of the DOE inspection checklist. W. Pierre notified Chem Pro that notes generated by EPA inspectors would not be readily available to Chem Pro. Chem Pro authorized the taking of photographs, provided they were notified so that they could make a note of things photographed. Chem Pro was notified that they had the right to claim information provided or presented during the inspection as confidential business information. D. Stefani indicated he was aware of that right.

R. West then discussed Chem Pro's compliance with financial requirements. He explained that Chem Pro's "umbrella insurance carrier" was getting out of the environmental impairment insurance business, but that the underlying insurer had renewed the policies which had expired on 3/31/85. R. West said that they had not yet received the final paperwork, but expected to receive it in a week or two and would submit a copy to EPA. Chem Pro agreed to submit a letter of explanation if the insurance paperwork was not received in a week or two. The insurance certificate was so provided.

According to R. West the trust agreement was established in 1981. A copy of the trust agreement was provided to the EPA inspection team.

Mike Kellar, Chem Pro's Operations Manager joined the conference and was introduced. Chem Pro was asked if they transported hazardous waste, they indicated that they did not, but that transportation was provided by a wholly owned subsidiary, Resource Recovery.

Having completed the opening conference, W. Pierre indicated that the inspection team was ready to inspect facility operations, operating records and plans. Chem Pro indicated that some tanks were waste oil tanks only, but that all of the tanks had been included in the Part A application.

All those involved in the opening conference drove to the facility at Pier 91, arriving at about 9:40 a.m.

Site Inspection

At the facility we were met by Bob Moody, the Site Manager. The inspection team was escorted on a tour of the facility. The following observations were made and information obtained during those inspections.

Tanks

The facility is comprised of what Chem Pro calls waste oil and waste water tanks. Tanks are covered and are located on concrete pads with concrete containment berms. Chem Pro indicated that leak detection was visual, but that the tanks were gauged daily.

Operating Procedures

Truck off-loading procedures was observed for a waste oil tanker truck. The truck contents were unloaded into the oil/water seperator. Two seperate samples were taken for a lab check which was performed by the truck operator at the facility lab. The samples were tested for pH, and for phenol and chrome 6. According to Chem Pro all truck operators are trained and checked on waste analyses procedure. The results of these waste analyses are written on the waste receipt form.

Security

The facility is located inside the Pier 91 compound. The Pier 91 Compound is surrounded by a fence 6 feet or more high and topped by barbed wire. To enter the compound, one must pass through a gate monitored by a guard. According to Chem Pro, a guard is on duty 24 hours a day. A number of other facilities and operations are also located inside the compound.

According to Chem Pro officials the guard will stop all who try to enter to check their credentials, unless they have the appropriate car sticker. At night, access is more restricted, according to Chem Pro. In addition there is a roving security force at Pier 91. The Chem Pro officials were not sure if there was a written agreement with the security force which outlined their procedures, staffing and hours of operation. Following the inspection, Chem Pro provided a written description of the security provided by Pier 91 (attached).

Contingency Plan, Waste Analysis Plan, and Closure Plan

Copies of the three plans were obtained during the inspection. A copy of the facility Spill Prevention Plan and Countermeasure Plan was obtained by mail after the inspection. An updated closure plan was sent to EPA on October 2, 1985 by A. Jeanne Van Wallendael. The contingency plan (and spill prevention and contermeasure plan), waste analysis plan, and updated closure plan were reviewed by an EPA contractor for compliance with applicable 40 CFR Part 265 requirements. The contractor reports are attached.

Findings

Specific findings appear above and on the attached checklist. The checklist (page I-1) contains a summary of findings.

Log of Slides Taken at Chemical Processors - Pier 91, Seattle, Washington on April 9, 1985 (the first roll of film shot was accidently overexposed)

Slide No.	Description
1	tank and secondary containment area at rear of the facility
2	facility fence (open) at rear of facility, just inside roadway and Pier compound gate
3	same as above
4	same as above
5	tanks and fire pump house (in background), as viewed from the rear of the facility
6	wastewater treatment tanks
7	wastewater treatment tank
8	truck unloading area at front entrance to facility, showing posted danger signs and drains
9	truck unloading area at front entrance to facility, showing drain (covered by metal grate) and sump
10	truck unloading area at front entrance to facility

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)

Region 10 Inspection Checklist

Purpose--This checklist is designed to serve as a guideline to the major points of the regulations adopted pursuant to RCRA for inspectors to use while visiting hazardous waste (HW) regulated facilities. This checklist should not serve as a substitute for a detailed knowledge of the relevant regulations. The following is the outline of the checklist.

I. General Information
II. Small Quantity Generator (SQG) Regulations (40 CFR 261.5)
III. Generator Regulations (40 CFR 262)
IV. Transporter Regulations (40 CFR 263)
V. Treatment, Storage, and Disposal (TSD) Interim Status Regulations (40 CFR 265)
VI. Treatment, Storage, and Disposal (TSD) Permit Status Regulations (40 CFR 264)

I. General Information (Date Revised November 21, 1983)

A. Date/Time Inspection commenced: 4/9/85

B. Facility
EPA/State ID WAD008129I7
Name & Addresses Chemical Processors
1. Mailing: 5501 Airport Way S. Seattle, WA 98108
2. Location: Pier 91 Seattle
Contact: ~~Jim~~ QS Dennis Stefani — (206) 767-0350
Telephone: ( )

C. Compliance Summary

	IN	OUT	N/A
RCRA (Statute)	( )	( )	( )
40 CFR 270	( )	( )	( )
40 CFR 124	( )	( )	( )
40 CFR 261.5	( )	( )	( )
40 CFR 262	( )	(✓)	( )
40 CFR 263	( )	( )	(✓)
40 CFR 264 (Permit)	( )	( )	(✓)
40 CFR 265	( )	(✓)	( )

Specific Violations: 262.20 - manifest deficiencies; 265.13 Deficient Waste Analysis; 265.15 - inspection logs w/out record of time of insp.; 265.16 deficient training program & failure to provide req'd real training; 265.52 deficient contingency plan; 265.112 inadequate closure plan; 265.142 inadequate closure cost estimate; 265.147 inadequate liability coverage; 265.143 - trust Agreement wording deficient;

D. Inspector

Name (Print) Andrew Boyd Title: Env. Prot. Spec.
Signature A. Boyd
Organization E.P.A. Region 10
Phone (206) 442-1254

E. **Inspection Participants:**

Name	Title	Phone #
WAYNE Pierre	EPA - EPS	
ANDREW BOYD	EPA - EPS	442-1254
Ron west	President - Chem Pro	747-0350
Dennis stefani	Chem Pro - Reg. Affairs	747-0350
David Gato	Boeing	241-3535
Lawrence Ashley	WDOE - NW office	885-1900

F. **Notification/Permit Information**

1. Started operation: 7/1/70 Date: _____
2. Notification filed: (YES) NO Date: Recd 8-18-80
3. Part A application filed: (YES) NO Date: Revised APP dates 7/23/82
4. Part B called/Date Due YES (NO) Date: _____
5. Part B application: YES NO Date: _____ N/A
6. Changes in Notification or Part A: _____
   Part A revised to show treatment 7/23/82
7. Facility's classified as:

Generator	(✓)
Transporter	( )
Treatment facility	(✓)
Storage facility	(✓)
Disposal facility	( )
Small quantity generator	( )
Recycler	( )
Less than 90 day storage	( )
Wastewater treatment unit exemption (WWTU)	( )
Elementary neutralization unit exemption (ENU)	( )

8. Does facility have a Part A withdrawal request in ?
   YES (NO)

   Status Interim Status facility

Comments: _____

G. Hazardous Waste Generation (HW)and Management (List EPA Waste Code)

1. General information

a. Characteristic HW (DXXX)?

(1) Ignitability D001
(2) Corrosivity D002
(3) Reactivity D003
(4) EP Toxicity D004, D005, 6, 7, 8, 9, 10, 11

b. Listed HW?

(1) HW from non-specific sources (FXXX)

(2) HW from specific sources (KXXX)
K049, K050, K051, K052

c. Discarded commercial chemical product(PXXX or UXXX)

(1) PXXX P110,
(2) UXXX U188, U051, U052, U053, U197

d. Has facility petitioned to delist waste? YES (NO)

Date: Comments:

e. Does facility qualify for WWTU or ENU? YES NO

Comments: Wastewater treatment or storage tanks
pre-treatment permit — Discharge to METRO —

f. Has a determination been made for each waste generated that it is or is not a RCRA hazardous waste?

(1) What are the wastes generated? Oily wastewater w/ phenolics (includes) —

(2) How was the hazardous waste determination made for each waste (i.e., lab analyses, knowledge of waste streams or processes, waste listed in Part 261)?

Comments: Unknown

(3) Are records available on the determination(s)? YES (NO)

(4) **Are all hazardous wastes noted during inspection listed on the facility's RCRA notification/ Part A application?** YES NO

If so explain.

2. Specific information
Provide the following information for each of the individual HW streams listed above. (Complete a separate form for each HW.)

a. EPA HW Code
b. HW description
c. Composition (including sampling requirements)
d. Process producing waste:
e. Rate of waste production
f. Time of storage
g. Waste handling prior to disposal
h. Waste disposal practice and manifest
i. Reporting and recordkeeping
j. Comments

H. Miscellaneous Notes:

III. Generator Regulations 40 CFR 262 (Date Revised November 21, 1983)

A. Is the facility or does facility claim to be a small quantity generator? YES (NO)

Comments:_____

B. Does generator transport its own waste? YES (NO)

1. If NO, what is contractor's EPA ID, name, address, and phone? Resource Recovery — WAD061672812 (Chem Pro subsidiary) United Drain Oil — WAD069552586 Gasoline Tank Services — WAD000643536

2. If YES, see Transporter Regulations (Section III).

C. Does generator use the manifest system? (YES) NO

Resources Based on review of several manifests — copies obtained of those w/ discrepancies

1. Does the Generator ever offer his hazardous waste to transporters or to TSD facilities which do not have an EPA ID number? YES (NO)

What transporters or TSD facilities? Not According to records checked

2. A generator transporting or offering for transport hazardous waste for off-site TSD must first prepare a manifest.

3. If the waste is undeliverable to the primary or alternate facility, the generator must either designate another alternate facility or instruct the transporter to return the waste.

Does the manifest contain the following information:

a. Manifest document number (YES) NO

b. Generator's name, mailing address, phone number, and EPA ID number YES (NO) see note

c. Name and ID number of each transporter (YES) NO

d. Name, address and EPA ID number of the designated and alternate TSD facilities, if any. YES (NO)

e. Description of waste(s) required by DOT regulations in 49 CFR 172.101, 172.202, 172.203. (YES) NO

See Attached Manifest II 04013 — incomplete mailing address

Note: not classified as a hazardous waste

Manifest II 04013 incomplete facility Address

- Proper shipping name — YES NO
- Hazard Class — YES NO
- Identification number — YES NO

f. Total quantity of <u>each</u> hazardous waste by units of <u>weight</u> or <u>volume</u> and type and number of containers placed aboard transport vehicle. — YES NO

4. Does the manifest contain the certification attesting to proper classification, description, packaging, labeling, marking and condition in accordance with DOT and EPA regulations? — YES NO

5. Does the manifest contain an adequate number of copies to provide one copy for:

a. Generator's records — YES NO

b. Records of each transporter — YES NO Not determined

c. TSD facility owner or operator's records — YES NO "

d. Signature by each transporter and return to generator — YES NO

e. Signature by TSD facility and return to generator — YES NO

6. Does the generator use the manifest properly by:

a. Signing the certification — YES NO

b. Obtaining signature and date of acceptance from initial transporter — YES NO

c. Retaining one copy of the transporter's signed manifest for 3 years or until receipt of a signed copy from disposal facility — YES NO

d. Giving transporter the remaining copies of the manifest — YES NO Not determined

7. Does the generator contact the transporter and/or the designated TSD facility to determine the shipment status in the event that a signed copy from the designated facility has not been received within 35 days? — YES NO N/A

V. TREATMENT, STORAGE and DISPOSAL (TSD) Interim Status Regulations Facilities, 40 CFR 265. (Date Revised November 21, 1983)

A. Type of Activity

1. Storage

a. Containers	( )
b. Tanks	
(1) Above ground	(✓)
(2) Below ground	( )
c. Surface Impoundments	( )
d. Waste Piles	( )
e. Other	( )

2. Treatment

a. Settling	(✓)
b. Evaporation	( )
c. Filtration	( )
d. Energy Recovery	( )
e. Incineration	( )
f. Thermal Treatment	( )
g. Recycling/Recovery	( )
h. Chem/Phys/Biological	(✓)
i. Other	( )

3. Disposal

a. Landfill	( )
b. Land Treatment	( )
c. Surface Impoundment	( )
d. Incineration	( )
e. Other	( )

4. Comments:

5. Are hazardous wastes accepted from "outside" (off-site) sources(wastes not generated on site)? (YES) NO

a. If YES, has a chemical and physical analysis of a representative sample been obtained in accordance with 40 CFR 265.13? YES (NO)

Waste Analysis Plan is deficient — see Contractor Report Attached —

b. Does the facility confirm that each hazardous waste received at the facility matches the identity of the waste on the manifest? (YES) NO

visual exam —

c. How does the facility determine this?

Also by limited Analyses pH, test for chrome & phenols —

B. Subpart B - General Facility Standards (40 CFR 265.10 - 265.17)

1. Does the facility obtain a detailed analysis of his waste prior to storing, treating, or disposing of it? YES NO

Describe: Waste Analysis Plan is deficient — see attached Compliance Report

2. Does the facility follow a Written Waste Analysis Plan Does the Plan include?

a. Parameters to be tested? YES NO — inadequate
b. Methods of analysis? YES NO — inadequate
c. Methods to get representative samples? YES NO — inadequate
d. Testing frequency? YES NO

Comments: See Attached Compliance Report —

3. Did inspector collect a copy of the Plan for a thorough review of it at EPA's offices? YES NO

4. Security

a. Have site owner/operators taken appropriate measures to ensure against unauthorized entry? YES NO — See Below

(1) Are signs posted at each entrance to active portion, and at other locations, in sufficient numbers to be seen by an approach? YES NO

(2) Are they legible from a distance of 25 feet or more? YES NO

(3) Does the facility have a 24-hour surveillance system or artificial or natural barrier/or combination of both, to control access to the active portion? YES NO

Comments: Facility is w/in the Pier 51 fenced compound along with a # of other facilities. Access to compound is restricted — see attached statement on Pier 51 security —

Not from entry by those admitted to Pier 51 Compound

5. Does the facility follow a Written Inspection Schedule (40 CFR 265.15? YES NO — Schedule on insp logs

a. Does it include inspecting all:
Monitoring equipment? N/A YES NO
Safety and emergency equipment? YES NO
Security devices? YES NO — monthly
Detecting equipment? — N/A YES NO

Should prepare a written schedule

Dangerous waste storage areas? YES NO

b. Is this inspection schedule maintained at the facility? YES NO

c. Is an inspection log maintained? YES NO

(1) Is the log, or its summary, kept at the facility for at least three years from the date of inspection? YES NO

(2) Does the log include:

(a) date of time of inspection? YES NO — Not. time

(b) inspectors name? YES NO

(c) observations? YES NO — primarily a checklist format

(d) date and nature of repairs? YES NO — space provided

Comments:

6. Personnel Training (40 CFR 265.16)

a. Has a training program been developed? YES NO
What Type? (Classroom/on-the-job) Both

b. Does the program include contingency plan and response training? YES NO

c. Does the program include measures to familiarize personnel with emergency response equipment, procedures, and systems including: YES NO

(1) Procedures for using and maintaining equipment? YES NO

(2) Key parameters for automatic waste feed cut-off systems. YES NO N/A

(3) Communications or alarm equipment YES NO

(4) Response to fire and explosions YES NO

(5) Response to ground water contamination incidents? YES NO

(6) Facility shut down? YES NO

d. Are records available at the facility for the following:

(1) Job title for each position related to hazardous waste management and maintaining equipment? YES NO

(2) Written job description for each job title? YES NO Not determined

(a) Does the job description include the skill, education or qualifications required for the position YES NO

(b) The duties assigned to that position? YES NO

(3) A written description of the type and amount of training to be given to those in each job position? YES NO

(4) A record of training completed or experience obtained for each job position by employee YES NO

(5) Was the required training obtained within 6 months of employment or by May 19, 1981, by each individual involved in hazardous waste management activities? YES NO

C. Perrott - started 1/22/85 - no trainins recorded - on 3/1/85 - C. Perrott did toxic gasins -

Also

N. Matthews - failed to receive quarterly SPCC trainins

C. Subpart C - Procedures and Preventions (40 CFR 265.30)

1. Is facility maintained and operated to minimize the hazards of fire, explosion, and sudden or non-sudden releases to the environment? Generally YES NO

   Explain: However - Are Contingency Plan deficiencies - & waste Analyses deficiencies - see Attached Contractor Reports

2. Is internal emergency communication equipment or alarm systems installed? YES NO

   What type? No Alarm or intercom system - Workmen carry 2 way radios for communication

3. Is a device (e.g., telephone) immediately available for summoning emergency assistance? YES NO

4. Are fire extinguishers or other emergency equipment immediately available on-site? YES NO

5. Is emergency communications and response equipment tested? YES NO

   How often? Alarm System Motor tested weekly - Radios used daily

6. Is aisle space adequate for emergency response? N/A YES NO

   What is the aisle spacing?

7. Have any arrangements been made with local emergency response organizations? Not formally except YES NO

8. Which organizations? Seattle Fire Dept - regular inspections Crowley Env. Crowley Environmental - under contract for emergency response -

9. If local organizations have declined to enter into response agreements, is this documented in the facility's operating record? N/A YES NO

   Explain

D. Subpart D - Contingency Plan and Emergency Procedures 40 CFR 265.50

1. Has contingency plan been developed? (It may be a modified SPCC plan) — YES / NO

2. Have incidents occurred where the plan has been implemented? — YES / NO (Not According to facility reps.)

3. Have incidents occurred where the plan should have been implemented but was not — YES / NO

   Explain (Not identified)

4. A copy of the plan should either be obtained for post-inspection office review or it should be examined during inspection for the following:

   a. Does the plan describe actions to be taken by personnel in response to fire, explosion, or releases to the environment? — YES / NO (Insufficient detail — see Contractor report Attached)

   b. Does the plan describe arrangements made with external emergency response organizations? — YES / NO

   c. Does the plan list those qualified to act as emergency coordinator including their name, address, and phone? — YES / NO (No Address)

      (1) Is the list current? (Prepared 1/84) — YES / NO

   d. Is all emergency equipment available at the facility listed in the plan? — YES / NO

      (1) Is the location and a description of the equipment included? (No location) — YES / NO

      (2) Are capabilities described for each piece or equipment unit? — YES / NO

   e. Does the plan include evacuation procedures including a description of signals to initiate evacuation (and routes and alternative routes)? — YES / NO

f. Is a copy of the plan maintained at the active facility (versus main office)? (YES) NO

(1) Has a copy been supplied to appropriate off-site emergency response organizations? (YES) NO
To which? Crowley Env. + Seattle Fire Dept —

5. Is at least one designated person always available to respond to emergencies (i.e., of those on the coordinator list)? YES NO
How are they available off-hours — access by answering service —

6. What are the limits of this person's authority to respond to emergencies?

a. Has an emergency occurred? YES (NO)

b. Was the plan implemented? YES NO N/A

c. (Describe the incident)

E. Subpart E - Manifest System, Recordkeeping, and Reporting 40 CFR 265.70

1. Manifest System

Responses Based on manifests reviewed Attached

a. Upon receipt of a manifested hazardous waste shipment, does the TSD facility:

(1) Sign and date each copy of manifest receipt of certifying waste? YES NO

(2) Note any discrepancies on each copy? No discrepancies noted YES NO

(3) Give delivering transporter one signed and dated copy of the manifest? YES NO Not determined

(4) Send a S/D copy of the manifest to the generator within 30 days after delivery and? YES NO "

(5) Retain a copy of each manifest at the facility for 3 years from delivery? YES NO

b. If the TSD facility initiates a hazardous waste shipment, does it comply with generator requirements in Part 262? YES NO - see Checklist Section III

c. Does the TSD facility examine manifests and wastes received to detect any significant discrepancies in quantity or type of waste, such as: YES NO Repeatedly

(1) Bulk waste-quantity variation of 10 percent or greater

(2) Batch waste - any variation in piece count

(3) Waste type - obvious differences discernible by inspection or waste analysis

d. If significant discrepancies are found, does the TSD facility:

N/A None identified

(1) Reconcile discrepancies with generator or transporter within 15 days? or YES NO

(2) Immediately submit to EPA-RA a Discrepancy Report describing the discrepancy and attempts to resolve it and a copy of the manifest involved? YES NO

e. TSD facilities must keep a written operating record documenting the following details:

(1) Waste description and quantity received recorded on waste receipt forms

(2) Methods and dates of its treatment, storage, and disposal same

(3) The location and quantity of each HW at the facility same

2. Operating Record

a. Does the owner/operator of the facility maintain an operating record at the facility (40 CFR 265.73)? (YES) NO

b. Does the record contain the following information.

(1) A description of, and the quantity of each HW received, and the method(s) and date(s) of its treatment, storage, or disposal at the facility? Records on quantity — date recd YES NO
— Availability of TSD records not determined —

(2) The location of each Hazardous Waste within the facility, and its quantity? YES NO not determined

(3) A map showing disposal sites? YES NO N/A

(4) Summary reports and details of all incidents that require implementing the Contingency Plan? not implemented YES NO N/A

(5) Records and results of inspections as required (need only be kept three years)? (YES) NO

(6) All closure and post-closure cost estimates required for the facility? (YES) NO

(7) The results of testing and waste analysis? (YES) NO

3. **Facility Reporting Procedures**

a. Has the owner/operator prepared and submitted a single copy of the Annual Report to EPA by March 1 of each year? YES NO

b. Is owner/operator familiar with procedures for emergencies? YES NO

c. If a TSD facility accepts a regulated hazardous waste shipment without the required manifest or shipping paper, does it file an "Unmanifested Waste Report" within 15 days or receipt? YES NO

F. Subpart F - Ground-Water Monitoring (40 CFR 265.90)

1. Are ground-water (GW) monitoring regulations required at this facility? YES (NO)

No disposal on site indicated

2. If YES, what is the relevant process unit?

a.	Surface impoundment	( )
b.	Waste pile	( )
b.	Land treatment	( )
c.	Landfills	( )
d.	Other	( )

Describe:

3. Has the owner/operator implemented a ground water monitoring plan? YES NO

4. If NO, has the facility implemented one of the following:

a.	GW Waiver [265.90(c)]	( )
b.	Alternate GW Monitoring System [265.90(d)]	( )
c.	Neutralization Waiver (265.90(e)]	( )
d.	Describe:	

5. Does the ground water monitoring program consist of the following:

a.	At least 1 upgradient and 3 downgradient wells?	YES NO
b.	GW Sampling and Analysis Plan	YES NO
c.	GW sampling quarterly first year	YES NO
d.	GW sampling semiannually after that	YES NO
e.	Drinking Water Standards parameters	YES NO
	Sampling frequency_____	
f.	GW Quality parameters	YES NO
	Sampling frequency_____	
g.	GW Indicator parameters	YES NO
	Sampling frequency_____	
h.	GW elevation parameters	YES NO
i.	Outline GW Quality Assessment Program	YES NO
j.	Statistical Analysis of Indicator parameters	YES NO

Results:

6. **Has the facility implemented GW Quality Assessment program.** YES NO

   a. Date: _____
   b. Results:

7. Does the facility maintain the necessary records.

   a. Initial background parameter concentrations YES NO
   b. Subsequent parameters concentrations YES NO
   c. Statistical evaluations YES NO

8. Has the facility reported necessary information YES NO

   a. DW Standards for 1st year YES NO
   b. GW Indicator parameters annually YES NO
   c. Statistical evaluation YES NO

9. Comments:

G. Subpart G - Closure and Post-Closure (40 CFR 265.110)

Closure

1. - Has the facility developed a closure plan which outlines all necessary steps to safely close the facility? (40 CFR 265.117)

   a. Description of how and when the facility will be partially closed (if applicable) and finally closed? YES NO
   No partial closure planned

   b. Estimate of the maximum inventory of wastes in storage and in treatment at any time during the life of the facility? Are such estimates YES NO

   c. Description of the steps needed to decontaminate the facility equipment during closure? YES (NO)

   d. Comment: See Attached Contractor Report - Work Assignment 85-429 - for deficiencies

Post-Closure No disposal N/A

2. Has the facility developed a post-closure plan which contains the following steps to safely care for the facility after closure/post-close of the facility? (40 CFR 265.117)

   a. Description of how post closure will be carried out for the next 30 years. ( ) ( )

   b. Notice to the local land authority within 90 days after closure is completed? ( ) ( )

   c. Notice in deed to property? ( ) ( )

H. Subpart H - Financial Requirements 40 CFR 265.140

1. Liability

a. (1) Does facility maintain liability insurance for sudden occurrences in the amount of at least $1 million per occurrence with an annual aggregate of at least $2 million? YES NO

According to R-West — insurance expired 3/31/85 — will provide paperwork on new insurance policy — provided 4/30/85

only 500,000 each occurrence 500,000 annual aggregate

(2) By what method did the owner/operator demonstrate sudden liability coverages to the RA?

(a) If HW facility liability endorsement(s) ( )

(b) If HW facility certificate(s) of liability insurance ( )

(c) financial test ( )

(d) corporate guarantee ( )

(e) multiple mechanisms (specify) ( )

2. If a surface impoundment, landfill, or land treatment exist at the facility, NO

b. (1) does facility maintained liability insurance for nonsudden occurrence in the amount of at least $3 million per occurrence with an annual aggregate of at least $6 million? YES NO

N/A

(2) By what method did the owner/operator demonstrate non-sudden liability coverage to RA?

(a) HW facility liability endorsement(s)' ( )

(b) HW facility certificate(s) of liability insurance' ( )

(c) financial test ( )

(d) corporate guarantee ( )

(e) multiple mehcanisms (specify) ( )

c. Has owner/operator submitted an originally signed duplicate of liability coverage demonstration to RA? Yes

d. Is wording of liability coverage instruments identical to that specified in 40 CFR 264.151? 151 YES NO

Comment:

2. Assurance

a. Closure

(1) Has facility prepared a written estimate of the cost of closing the facility in accordance with the closure plan (40 CFR 265.112)? Yes NO

Closure Plan deficient See attached Contractor report

(2) Is this cost estimate adjusted annually for inflation? Last estimate dated 8/9/84 YES NO

(3) Has facility established financial assurance for the closure of the facility (40 CFR 265.143)? YES NO

(4) By what method has this been achieved:

(a)	Trust fund	(✓)
(b)	Surety bond (with standby trust)	( )
(c)	Letter of credit (with standby trust)	( )
(d)	Insurance	( )
(e)	Financial test	( )
(f)	Corporate guarantee	( )
(f)	Multiple mechanisms	( )

(5) Has facility submitted an originally duplicate of financial assurance to RA? YES NO

Includes Preamble & references to State env. agencies + other language not included in language provided by 40 CFR 264.151

(6) Is wording of the financial assurance statement identical to that specified in 40 CFR 264.151 YES NO

(7) Comment: Trust Agreement executed 7/7/82

for the benefit of the "Applicable environmental control agency" — rather than EPA

b. Post-Closure (Disposal Facilities) N/A

(1) Has facility prepared a written estimate of the cost of post-closure monitoring and maintenance of the facility (40 CFR 265.144)? YES NO

(2) Is this cost estimate inflation adjusted annually YES NO

Also lack of cert. that the wording is identical to that at (c)(1)

(3) Has owner/operator established financial assurance for the post-closure care of the facility (40 CFR 265.145)? YES NO

(4) By what method has this been achieved:

(a) Trust fund ( )
(b) Surety bond (with standby trust) ( )
(c) Letter of credit (with standby trust ( )
(d) Insurance ( )
(e) Financial test ( )
(f) Corporate guarantee ( )
(g) Multiple Mechanisms ( )

8. Has owner/operator submitted an originally signed duplicate of financial assurance to Regional Administrator? YES NO

9. Is wording of the financial assurance statement identical to that specified in 40 CFR 264.151? YES NO

I. Subpart I Use and Management of Containers (40 CFR 265.170)

1. Does this section apply to this facility? YES (NO)

2. Are the containers made of or lined with materials which will not react with and are compatible with the hazardous waste to be stored in them? YES NO

3. Are the containers always closed, except to add or remove waste? YES NO

4. Are container storage areas inspected weekly for leaks and container deterioration (40 CFR 265.174)? YES NO

5. Are precautions taken to prevent accidental ignition or reaction of ignitable or reactive waste? YES NO

6. Are containers holding ignitable or reactive waste located at least 50 feet from the facility's property line? YES NO

7. Is the facility aware of and complying with the following requirements for incompatible wastes:

   a. Incompatible wastes must not be placed in the same containers, unless in compliance with 265.17(b) YES NO

   b. HW must not be placed in an unwashed container that previously held an incompatible waste YES NO

   c. Are storage containers holding HW that are incompatible with any waste or other material stored nearby separated from or protected from them by means of a dike, berm, wall, or other device? YES NO

   Explain?

8. Are containers marked or labeled in a manner equivalent to 40 CFR 172 subpart E? YES NO

9. Comments:

N/A

No haz waste drums on site

J. Subpart J - Tanks (40 CFR 265.190)

1. Does this section apply to this facility? (YES) NO

2. - Do tanks on the facility hold hazardous waste? YES NO

   If so, what are their contents?
   Primarily waste oil — Also waste water — DOT waste — see manifest 8-20-84

3. Is storage in tanks conducted such that:

   a. It does not generated heat, pressure, fire, explosion or violent reaction? (If no, explain) (YES) NO

   No indication of the following during the inspection

   b. It does not produce uncontrolled toxic mists, fumes, dusts, or gases? (If no, explain) (YES) NO

   c. It does not produce uncontrolled flammable fumes or gases? (YES) NO

   d. It does not damage the tank? (YES) NO

   e. It does not threaten the environment in other ways (i.e., leaks, spills)? (YES) NO

   Comments:

4. Is 2 feet of freeboard maintained in uncovered tanks? (YES) NO

   If no, is secondary containment used? YES NO

   (Explain) Secondary containment provided for most tanks on site

5. Is the tank(s) continuously fed? YES (NO)

   If yes, is there a means to stop inflow? YES NO

   Explain

6. Are Hazardous Waste storage tanks operated in a manner which minimizes the possibility of overfilling? YES NO

   How:
   - Waste feed cut-off ( )
   - Bypass system to another tank ( )
   - High level alarm ( )
   - Other Daily gauging or checking of levels before filling ✓

7. **Are inspections of the following conducted:**

   a. **Discharge control equipment?** N/A YES NO
      How often?

   b. **Waste feed cut-off systems?** N/A YES NO
      How often?

   c. **Data from tank monitoring equipment?** YES NO
      How often N/A

   d. **The level of waste in the tank?** daily YES NO daily gauge sheet
      How often?

   e. **The structural integrity of tank?** YES NO
      How often? weekly
      How are inspections conducted?
      What is observed (looked for)? 2 visual

   f. **The immediate area around the tank for signs of leaks and the integrity of secondary containment (if any)?** YES NO

No tank inspection for weeks of 11/28/83 + 11/7/83

8. **Have any tanks once used for storage of hazardous waste been closed or their function changed? When?** NO — No indication of such

   a. **Were all hazardous wastes and/or residues removed?** YES NO

   b. **What was the disposition of the wastes or residues (i.e., where did it go)?** YES NO

   c. **When shipped?**

9. **Are ignitable or reactive wastes placed in tanks?** Pool waste recid from Boeing 12/10/84 manifest 960-48 — no flash point test performed YES NO

10. **If yes, what measures are used to prevent ingnition or reaction?** No special measures identified 2 unconfirmed

11. **Have wastes been placed in a tank which previously contained potentially incompatible waste or residue?** Not determined YES NO No indication

12. **If reactive or ignitable wastes are stored in covered tanks, are they in compliance with the National Fire Protection Association's buffer zone requirements?** tanks are covered — do have vents which are kept open YES NO

13. **Are "No Smoking" signs posted?** YES NO

14. Have others measures been adopted to reduce hazards associated with storage of ignitable or reactive waste in tanks? YES NO

- Explain foam fire fighting system

15. Waste Analysis and Trial Tests

Before treating and storing of hazardous waste in a tank is a detailed chemical and physical analysis of the waste obtained? YES NO

— Analyses limited to PH, Chrome & Phenols
— Flash Pt. tests not regularly conducted

16. Does the company have and follow a written waste analysis plan? YES NO

a. Does the plan identify parameters used? YES NO

Explain See Contractor Report Attached

b. Sampling Method? YES NO

Explain

c. How frequent is analysis repeated? Limited analyses for each load received YES NO

d. Are results of waste analysis and trial tests placed in the facility's operating record. Yes

17. Are waste analyses done when a tank is used to treat or store a HW which is substantially different or treated differently from waste previously treated or stored in the tank? YES NO

No such incident indicated

K. Subpart K - Surface Impoundments (40 CFR 265.220)

1. **Does this section apply to this facility?** YES (NO) N/A

2. **Does the surface impoundment maintain enough freeboard to prevent any overtopping of the dike by overfilling, wave action, or a storm?** YES NO N

3. Are the surface impoundments designed and operated to allow two feet of freeboard? YES NO

4. Do earthen dikes have a protective cover which minimizes erosion (grass, rock, shale)? YES NO

5. Is a waste analysis or trial test conducted whenever a surface impoundment is used to chemically treat a HW which is substantially different or treated differently from waste previously treated in the surface impoundment? YES NO

6. Are results of waste analyses documented in the facility's operating record? YES NO

7. Are the surface impoundments inspected on a routine basis? How often? YES NO

8. Are ignitable or reactive wastes held in a surface impoundment (40 CFR 265.229)? YES NO

9. Comments:

The following 40 CFR Subparts do not have a specific checklist prepared because few of these types of facilities exists in Region X. Inspection made at facilities which operate any of the following would require the inspector to prepare an inspection checklist prior to the site visit.

L. Subpart L - Waste Piles (40 CFR 265.250)
M. Subpart M - Land Treatment (40 CFR 265.270)
N. Subpart N - Landfills (40 CFR 265.300)
O. Subpart O - Incinerators (40 CFR 265.340)
P. Subpart P - Thermal Treatment (40 CFR 265.370)
Q. Subpart Q - Chemical, Physical, and Biological Treatment (40 CFR 265.400)
R. Subpart R - Underground Injection (40 CFR 265.430)

VI. Treatment, Storage, and Disposal (TSD) Permit Regulations (40 CFR 264) (Date Revised November 21, 1983)

This Part of the checklist does not have a specific checklist prepared because the checklist would be different for each facility. A compliance inspection made at a facility which has been issued a Part B Permit needs to have checklist and/or narrative which reviews all of the requirements of the facility's Permit. This checklist and/or narrative needs to be developed by the individual inspector.